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STATE OF VERMONT
CHITTENDEN COUNTY, SS.
MYERS CRETE REALTY, INC.)
Plaintiff)
v.)
) SUPERIOR COURT OF VERMONT
KIMBERLY GABAREE) CHITTENDEN CIRCUIT
Defendant) DOCKET NO. 51-02 CnC

COMPLAINT

2002-cv-15

NOW COMES Plaintiff, Myers Crete Realty, Inc., by and through its attorney, William R. Norful, Esq., with address at 327 Main Street, Suite 8, Winooski, Vermont 05404, and hereby alleges against Defendant *to wit*:

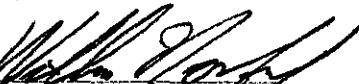
1. Plaintiff, Myers Crete Realty, Inc., is a Vermont Corporation with principal offices located in the City of Winooski, in the County of Chittenden, and State of Vermont.
2. Defendant, Kimberly Gabaree, is a resident of the City of Winooski, in the County of Chittenden, and State of Vermont, residing in property owned by Plaintiff located at 99 Union Street, Winooski, Vermont.
3. Defendant has occupied premises at 99 Union Street, Winooski, Vermont since 1998, pursuant to a month to month tenancy.
4. Defendant has been continuously late with rental payments due the first of each month and is currently in arrears in the amount of \$1362.00.
5. Defendant was issued a *Landlord's Notice to Vacate* for nonpayment of rent via Chittenden County Sheriff's Department on September 19, 2001. To date, Defendant has not redeemed tenancy by paying full amount due and remains in possession of premises without right or consent of the Plaintiff.

WHEREFORE, Plaintiff prays for the following relief:

That Plaintiff shall be issued a *Writ of Possession* regarding the aforementioned premises and granted such and other relief as deemed appropriate by this Court.

DATED at Winooski, Vermont this 17th day of December, 2001.

Respectfully submitted:


William R. Norful, Esq.
Attorney for Plaintiff